

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 HANFORD PROJECT OFFICE

712 Swift Boulevard, Suite 5 Richland, Washington 99352

**EDMC** 

October 31, 2002

Mr. Kevin Leary Project Manager U.S. Department of Energy Richland Operations Office Box 550, A6-38 Richland, WA 99352

RE:

**U-Plant Canyon Disposition Initiative** 

Dear Mr. Leary:

The topic of Resource Conservation and Recovery Act (RCRA) Applicable or Relevant and Appropriate Requirements (ARARs) and, specifically, land disposal restrictions (LDRs) has been of concern lately with regard to the contamination within the U-Plant and particularly material that remains in vessels within the U-Plant. The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) have discussed the issue of LDRs at U-Plant. We believe that the parties should consider a site-specific treatability variance for those materials for which grouting is not the accepted method of treatment.

The treatability variance would be based on technical information provided by the U.S. Department of Energy (DOE) and its contractor and would be written into the Record of Decision. We believe that much of the technical information already exists. As EPA and Ecology project managers, we wish to meet with you to discuss details of a possible treatability variance. Treatability variances have been applied successfully in a number of cases across the DOE/Department of Defense complex.

Please contact Rick (509 736-3007) or Craig (509 376-8665) to discuss this further at your convenience.

Sincerely,

Craig Cameron

**EPA Project Manager** 

Rick Bond

**Ecology Project Manager** 

Matt Mills, Ecology CC

Lloyd Zinsler, Fluor Hanford

Craig Comeron

Fred Ruck, III, Fluor Hanford

Dave Bartus, EPA

Administrative Record: U-Plant Canyon Disposition Initiative